

**In the United States District Court
District of South Carolina
Greenville Division**

**T&S Brass and Bronze Works, Inc. and
EnviroPure Systems, LLC,**

Plaintiffs,

V.

James Slanina, James Taylor, Linda Basinger, and Advantagreen,

Defendants.

C.A. No. 6:16-cv-03687-MGL

**CONSENT ORDER OF DEFENDANT
TAYLOR RE PLAINTIFF'S AMENDED
MOTION FOR PRELIMINARY
INJUNCTION**

Order

With respect to Plaintiffs' Motion for a Preliminary Injunction, Defendant James Taylor ("Taylor") voluntarily consents to the following forms of injunctive relief, and Plaintiffs stipulate that the entry of this Order resolves the issues as to the relief requested in Plaintiffs' Motion for Preliminary Injunction and Amended Motions for Preliminary Injunction (Docket Entries 16, 29, and 41) as to Defendant Taylor.

Taylor will refrain from:

1. Altering, erasing, deleting, destroying, and/or modifying any computer or computerized device or electronic storage device in his possession, custody, or control where information that is potentially relevant to this litigation is likely to be stored;
2. Using or disclosing the plaintiffs' trade secrets and/or confidential, proprietary, and/or sensitive information;
3. Developing, marketing, selling, or exercising any ownership or dominion over products or services in the food waste disposal industry in violation of his Covenants Agreements;
4. Conducting any business with, assisting, consulting with, or communicating about the food disposal industry with Karen or Daniel Wordsworth, X-Met, Bond of London, or OMPECO, or any employees, agents, or affiliates thereof

5. Disparaging Plaintiffs and their principals, including Claude Theisen.
6. Entering into any employment relationship with any person or entity for the purpose of developing, manufacturing, or selling any food disposal systems, Biomix, and/or any chemical providing the same or substantially similar function.

In addition, Taylor will:

7. Comply with all obligations of his Covenants Agreements, including the cessation of all activities relative to the manufacture, distribution, sale, or marketing of food waste disposal systems, Biomix, and/or any chemical providing the same or similar function'
8. Preserve all copies of communications and documents, whether in paper or electronic form, related to EnviroPure and/or any of its products, including but not limited to all documents and data obtained, generated, or discovered in the course and scope of Taylor's business and professional activities since December 1, 2012;
9. Preserve all communications and documents regarding Taylor's dealings with X-Met, Karen Wordsworth, Danny Wordsworth, Hubbard-Hall, Warehouse Associates, C.H. Robinson, AAA Bar & Catering, BN Green, Foodwastemachine.com, and any other person or entity with whom Taylor has communicated or dealt since January 1, 2013, regarding the marketing, manufacture, or sale of food disposal machines, Biomix, and/or any chemical providing the same or similar function;
10. Return all equipment and nondocumentary property, such as electronic devices, machines, parts, tools, etc. belonging to Plaintiffs that are still in Taylor's possession, custody, or control to Plaintiffs within five (5) days after the date of this Order at Taylor's expense'
11. Itemize for Plaintiffs and hold in trust all funds received from the sale of goods or services related to food disposal systems and related products that Taylor received from January 1, 2016 forward except any payments received directly from Plaintiffs.

Taylor waives any requirement that Plaintiffs post any bond or security with regard to this Order.

This Order supersedes the Court's Temporary Restraining Order (Docket Entry 11) as to Defendant Taylor, which shall be dissolved as to him only contemporaneously with the entry of this Order.

This Injunction shall remain in effect during the pendency of this litigation unless modified or vacated.

IT IS SO ORDERED.

s/Mary Geiger Lewis
Mary Geiger Lewis
United States District Judge

December 14, 2016
Greenville, South Carolina

WE CONSENT:

For the Plaintiffs:

For Defendant Taylor:

s/ Brian P. Murphy
Brian P. Murphy
Stephenson & Murphy, LLC

s/ Steven E. Buckingham
Steven Edward Buckingham
The Law Office of Steven Edward Buckingham,
LLC